2. As noted in the NPRM, several approaches have been offered by various industry proponents as to how US support contributions should be assessed. We agree with the comments of the FCC in the NPRM that a uniform per line or per minute charge, which links the assessment mechanism to a specific rate structure, could be extremely cumbersome to implement. An alternative option would be to assess carriers based on their gross interstate telecommunications revenues or on gross retail revenues. Finally, carriers could be assessed based on their gross interstate revenues net of intermediary payments to other providers. (¶ 122-126)

The FPSC suggests that a revenue-based assessment scheme would the easiest procedure to implement. However, we are still evaluating which revenue-based scheme is most appropriate and has the least competitive impact. We believe that the likely impact on various types of telecommunications carriers should be quantified prior to deciding this key issue. We are presently analyzing alternative procedures to see if a compromise approach is possible.

3. It is difficult to comment on who should administer the fund until it is determined what the fund will be. At this time, there are too many variables to consider. Accordingly, we reserve comment at this time. (\P 130)

Respectfully submitted,

Cynthia Miller Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

DATED: April /\ , 1996

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

In the Matter of:)				
Federal-State Joint Board on Universal Service)))	CC D	ocket	No.	96-45

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Comments of the Florida Public Service Commission has been furnished to the parties of record on the attached list this day of April, 1996.

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